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10 Attorneys for Defendant and Counterclaimant
LIBERTY MUTUAL FIRE INSURANCE COMPANY

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA

14 LARGO CONCRETE, INC., a California
15 Corporation; N.M.N. CONSTRUCTION,
15 INC., a California Corporation,

16 Plaintiffs,

17 v.

18 LIBERTY MUTUAL FIRE INSURANCE
18 COMPANY, a Massachusetts Corporation,
and DOES 1 through 100, inclusive.

19 Defendants.

20 Case No. C07-04651 CRB (ADR)

21 Hon. Charles R. Breyer
[Complaint Filed: September 10, 2007]

**SUPPLEMENTAL DECLARATION OF
LISA HANSEN FILED IN SUPPORT OF
LIBERTY MUTUAL FIRE INSURANCE
COMPANY'S REPLY BRIEF**

22 Date: December 21, 2007

23 Time: 10:00 a.m.

24 Place: Courtroom 8

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26
27
28 AND RELATED COUNTERCLAIM

1 **SUPPLEMENTAL DECLARATION OF LISA KRALIK HANSEN**

2 I, Lisa Kralik Hansen, declare as follows:

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4 1. I am an attorney duly admitted to practice before this Court. I have
5 personal knowledge of the facts set forth below and, if called and sworn as a witness, could and
6 would testify competently thereto.

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8 2. I am currently an attorney with Grace, Cosgrove & Schirm ("GCS"). Prior
9 to my employment with GCS I practiced law with Kern & Wooley LLP. During my employment
10 with Kern & Wooley the firm was coverage counsel for Liberty Mutual Fire Insurance Company
11 and its affiliates (collectively the "Liberty Mutual companies"). A significant part of my legal
12 practice over the years has involved representing the Liberty Mutual companies in litigated and
13 non-litigated matters, including insurance coverage disputes, "bad faith" claims and other related
14 matters.

15

16 3. During my employment at Kern & Wooley, I worked closely with then
17 Kern & Wooley associate Karen Gichtin. I was one of Ms. Gichtin's immediate supervising
18 attorneys and worked with her on a daily basis. I understand that she left Kern & Wooley and for
19 a period of time practiced with the firm of Roxborough, Pomerance & Nye (the "Roxborough
20 firm") in Woodland Hills, California. I understand that she is no longer employed at the
21 Roxborough firm.

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23 4. While employed at Kern & Wooley, Ms. Gichtin worked extensively on a
24 matter entitled Remedy Temp, Inc. v. Liberty Mutual Fire Ins. Co., C.D. Cal., 8:04-cv-00385,
25 which involved defendant Liberty Mutual Fire Insurance Company's claims handling for a
26 national market workers' compensation customer. The plaintiff in Remedy Temp alleged workers'
27 compensation "bad faith" on the part of Liberty Mutual Fire Insurance Company. Ms. Gichtin was

1 involved in virtually all aspects of the Remedy Temp litigation, including performing the
2 following tasks:

- 3 a. Reviewing and discussing Liberty Mutual's overall litigation
4 position and strategy;
- 5 b. Voluminous document productions, including protection of
6 confidential and privileged documents;
- 7 c. Reviewing and evaluating consultant reports and opinions;
- 8 d. Evaluating Liberty Mutual's claims handling practices;
- 9 e. Reviewing and addressing special service instructions;
- 10 f. Reviewing and addressing Liberty Mutual's internal best practices;
- 11 g. Reviewing Liberty Mutual's claims file materials and applicable
12 claims manuals;
- 13 h. Reviewing BoComp and ExPrs computer screens;
- 14 i. Reviewing and evaluating the RiskTrac computer system;
- 15 j. Preparing Liberty Mutual employees for deposition; and
- 16 k. Discussing specific disputed files with Liberty Mutual claims
17 handlers.

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19 5. Ms. Gichtin was an active member of Liberty Mutual's defense team in the
20 Remedy Temp litigation. Also, during her employment at Kern & Wooley, Ms. Gichtin worked
21 on several other matters for the Liberty Mutual companies involving insurance coverage, "bad
22 faith" claims, claim for equitable relief and contribution, and claims of malicious prosecution. Ms.
23 Gichtin worked almost exclusively for the insurance practice group that primarily represented the
24 Liberty Mutual companies and she primarily devoted her time to the Remedy Temp litigation.

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26 6. Messrs. Roxborough and Adreani of the Roxborough firm were opposing
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1 counsel in the Remedy Temp litigation.

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3 I declare under penalty of perjury, pursuant to the laws of the United States of
4 America, that the foregoing is true and correct.

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6 Executed this 11 day of December 2007 at Los Angeles, California.

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LISA KRALIK HANSEN